

Honorable Judge Marsha J. Pechman
Hearing Date May 29, 2025
Without Oral Argument

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KELLI MCCLURE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ROCKETREACH LLC,

Defendant.

CAUSE NO. 2:25-cv-00986-MJP

**STIPULATED MOTION TO EXTEND
TIME TO RESPOND TO COMPLAINT**

Plaintiff Kelli McClure and Defendant RocketReach LLC hereby jointly move the Court for an order extending the deadline for Defendant to respond to Plaintiff's Complaint.

On April 10, 2025, Plaintiff filed the summons and complaint against Defendant in the Superior Court for the State of Washington in and for the County of King ("State Court").

On May 23, 2025, Defendant filed a Notice of Removal to the U.S. District Court for the Western District of Washington.

Pursuant to Federal Rule of Civil Procedure 81(c)(2), Defendant's deadline to respond to the Complaint in the U.S. District Court for the Western District of Washington would be May 30, 2025.

STIPULATED MOTION TO EXTEND
TIME TO RESPOND TO COMPLAINT – 1

CAUSE NO. 2:25-cv-00986-MJP

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1 In light of the parties' agreement, to allow Defendant time for further investigation of
2 the claims and underlying facts and to evaluate potential defenses, and because a brief extension
3 will not prejudice Plaintiff, the parties hereby stipulate and agree that Defendant's deadline to
4 respond to the Complaint is extended to July 7, 2025.

5 Now, the parties jointly ask the Court to extend Defendant's deadline to respond to the
6 Complaint to July 7, 2025.

7 WHEREFORE, the parties respectfully request an Order modifying the current case
8 deadlines as described herein.

9 **ORDER**

10 IT IS SO ORDERED that the Defendant's deadline to respond to the Complaint is
11 hereby extended to July 7, 2025.

12 DATED this 30th day of May, 2025

13 
14 _____
15 Honorable Judge Marsha J. Pechman

16 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

17 DATED this 29th day of May, 2025.

18 WILSON, ELSER, MOSKOWITZ,
19 EDELMAN & DICKER LLP

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Attorney for Defendant

1 DATED this 29th day of May, 2025.

/s/ Timothy W. Emery

2 Timothy W. Emery, WSBA #34078

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned certifies that on May 29, 2025, a true and correct copy of the foregoing was served on the attorneys of record listed below, via the method indicated:

<p><i>Counsel for Plaintiff</i></p> <p>Timothy W. Emery, WSBA #34078 Patrick B. Reddy, WSBA #34092 Paul Cipriani, WSBA #59991 EMERY REDDY PLLC 600 Stewart St., Suite 1100 Seattle, WA 98101 emeryt@emeryreddy.com redryp@emeryreddy.com paul@emeryreddy.com</p> <p>Joseph I. Marchese, <i>Pro Hac Vice</i> Matthew A. Girardi, <i>Pro Hac Vice</i> BURSOR & FISHER, P.A. 1330 Avenue of the Americas, 32nd Floor New York, NY ykoppel@bursor.com mgirardi@bursor.com</p>	<p><input checked="" type="checkbox"/> U.S. Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> Facsimile <input type="checkbox"/> Overnight <input checked="" type="checkbox"/> E-mail <input checked="" type="checkbox"/> E-Service via Court Application <input type="checkbox"/> Messenger</p>
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I certify under the penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 29th day of May, 2025, at Seattle, Washington.

/s/Yhon Frakes
Yhon Frakes, Legal Assistant
Yhon.frakes@wilsonelser.com